



ABBY ROBINSON & ASSOCIATES LAW FIRM PLLC.

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JULY 14, 2020

TO DEFENDANTS: THE CITY OF JACKSON, MAYOR Chokwe Antar Lumumba, as the Mayor and in his individual capacity, CHIEF JAMES DAVIS, Individually and in his professional capacity, DEPUTY CHIEF DERRICK HEARNS individually and in his professional capacity, E. BRADLEY LUMUMBA(HONDO) in his professional capacity with the city of jackson and individually, and Vincent Grizzell in his professional capacity and individually.

Address:

The City of Jackson
219 SOUTH PRESIDENT STREET
JACKSON, MISSISSIPPI 39201



Plaintiffs avers that delivery for James Davis, Vincent Grizzell, Derrick Hearns, and E. Bradley (Hondo) personally has been emailed to them individually, John Doe and Jane Doe 1-10.

RE: Pursuit to Miss. Code Ann. 11-46-11(1) states that a party must file a notice of claim with the chief executive officer of a governmental entity 90 days before filing a lawsuit.

Re: Our Clients: Rakasha Adams, Michael Pugh, Melvin Williams, Dejon Artherberry, Rhonda Daniel, Rodney Daniel, Almeia Bolden, Sonya Bowman, David Marsalis, Keith Freeman, Pammela Rigby, Miron Smith, Terrance

Tiller, Candace Ingram, Vanessa Johnson, Tammie Heard, Mamie Barrett and over 10 other plaintiffs with the same issues whom, will be listed at the filing of the lawsuit. The non listed Plaintiffs are in fear of RETALIATION BY DEFENDANTS, but claims are similar to the claims of the listed Plaintiffs and therefore await the District Courts attention to the matter pursuant to federal statutes and laws.

Plaintiffs further avers that this lawsuit will likely be deemed a CLASS ACTION LAWSUIT, since the Plaintiffs appear to be within the jurisdiction of the District Courts.

NOTICE OF INTENT TO SUE all defendants named and unknown by name at this time: FOR VIOLATION OF GOVERNMENT OFFICIALS CORRUPTION, including PLAINTIFF'S 14th, 4th, 1st U.S. CONSTITUTIONAL AMENDMENTS, DUE PROCESS, RACE DISCRIMINATION, SEX DISCRIMINATION, SEXUAL ORIENTATION, (GAY RIGHTS), BREACH OF CONTRACT, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS, NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS, NEGLIGENT HIRING, NEGLIGENT SUPERVISING, Whistle Blowing Act violations, Bodily harm, Consortium, FRAUD, BREACH OF FIDUCIARY DUTY, BAD FAITH, MISREPRESENTATION, MISUSE OF LEGAL PROCEEDINGS, NEGLIGENCE PER SE, JOINT TORTFEASOR, MISAPPROPRIATION OF FUNDS THAT WERE SUPPOSED TO GO TO OFFICER, MIS-USE OF STATE PROVIDED FUNDS BULLYING, AND STRICT LIABILITY

Dear All named potential Defendants,

This law firm represents Rakasha Adams, Michael Pugh, Melvin Williams, Dejon Artberberry, Rhonda Daniel, Rodney Daniel, Almeia Bolden, Sonya Bowman, David Marsalis, Keith Freeman, Pammela Rigby, Miron Smith, Terrance Tiller, Candace Ingram, Vanessa Johnson, Tammie Heard, Craig Crowley Sr. Mamie Barrett, and over 10 other plaintiffs (at the present time of the commencement of this letter), regarding the following wrongful conduct by THE CITY OF JACKSON, MAYOR Chokwe Antar Lumumba, as the mayor and in his individual capacity, CHIEF JAMES

DAVIS. Individually and in his professional capacity, DEPUTY CHIEF DERRICK HEARNS individually and in his professional capacity, L. BRADLEY LUMUMBA(HONDO) in his professional capacity with the city of jackson and individually, and Vincent Grizzell in his professional capacity and individually.

All named Plaintiffs as well as those whom are in fear of retaliation, complains and brings this lawsuit to come, pursuant to MISS. CODE. ANN § 11-46-11-1 with this required 90 day notice of claims.

As such, all Plaintiffs named and unnamed at this time complains of the following but the list is not exhausted of claims: **FOR VIOLATION OF GOVERNMENT OFFICIALS**

CORRUPTION, including PLAINTIFF'S 14th, 4th, 1st U.S. CONSTITUTIONAL AMENDMENTS, DUE PROCESS, RACE DISCRIMINATION, SEX DISCRIMINATION, SEXUAL ORIENTATION, (GAY RIGHTS), BREACH OF CONTRACT, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS, NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS, NEGLIGENT HIRING, NEGLIGENT SUPERVISING, Whistle Blowing Act violations, Bodily harm, Consortium, FRAUD, BREACH OF FIDUCIARY DUTY, BAD FAITH, MISREPRESENTATION, MISUSE OF LEGAL PROCEEDINGS, NEGLIGENCE PER SE, JOINT TORTFEASOR, MISAPPROPRIATION OF FUNDS THAT WERE SUPPOSED TO GO TO OFFICER, MIS-USE OF STATE PROVIDED FUNDS, BULLYING, AND STRICT LIABILITY.

It follows that each Plaintiff assert claims that all Defendants have violated their 1st, 4th, and 14th United States Constitutional amendment rights as follows:.

Plaintiffs avers that they were censored by The Mayor, Cheowke Antar Lumumba, Chief James Davis, HONDO, Deputy Chief Vincent Grizzell, and Deputy Chief Derrick Hearn. As such, each Plaintiff has been forced not to disclose to the public of incidents that should be public record or they will be retaliated upon, each Plaintiffs' Due Process rights not to have to work 12-21 hours in a day, each Plaintiffs right to be secure in their persons, houses, papers and effects from seizures by the chief of Police, James Davis whom upon information and belief, as well as possible documentation was told by HONDO, the mayor's body guard, whom reports to the mayor personally most if not all events happening within the Jackson Police Department. Additionally, Plaintiffs contend that their desk, computers and even cell phones (even though some are city phones, their are some Plaintiffs whom had to use their personal cell phones because the City of Jackson said they could not afford for all the detectives to have individual phones), were under siege by this government agency and the Defendants as named for any employee, with the City of Jackson Police Department whom is leaking information to the press that the mayor, desires not to go public. (Plaintiffs contend that the information is public information for the safety of its citizen and the protection of life for the officers.

Furthermore, Plaintiffs contend that they are forced to work at the impound lot from hours of 9 p.m. until 5 a.m and then the same Plaintiffs would still have to work again in the office of detective from 8. a.m. until 4 p.m. and thats 3 days a week. Plaintiffs contend that Chief James Davis required Plaintiffs to have [2] detectives that should have

been doing, burglary, auto theft, fraud, inter alia, but could not for two days a week which the Administration of the City of Jackson required them as previously held.

Moreover, Plaintiffs contend that their 14th amendment right of DUE PROCESS, was violated when Plaintiffs would complain to Chief James Davis and Deputy Chief Grizzell, as well as Deputy Hearn, about morale, depression, insomnia, family issues, no break for self-re-fueling, inter alia, but the reply was that is what the chief wanted because the City of Jackson is so under staffed with officers until the administration must use detectives to do security work at a rate of pay that excelled any normal security job. In other words, these Plaintiffs would be paid at a rate of as much as \$20 per hour for person[s] the city could have hired for half that pay.

Then there are several Plaintiffs whom sexual orientation was violated when these Plaintiffs contend that Chief James Davis and Chief Derrick Hearn would bully them if they did not do acts such as write reports that did not hurt the city of Jackson, talk to them in a demeaning position, with you are unprofessional and then put them in positions of the dog pound to make the quit, refuse to allow them to use medical leave for issues of emotions that were caused by Defendants, as well as humiliate and embarrass them in front of co-workers.

Along side of the aforementioned atrocities these Defendants, mainly chief James Davis had the audacity to intentionally and negligently cause mental harm to women Plaintiffs because they were females and because they could not speak back to them without being retaliated as mentioned above, or even worse placed on leave to force these females to

quit. These female Plaintiffs contend this is because they are female. What chief James Davis failed to realize that is that these female Plaintiffs have a recording and paper traces of these illegal acts.

Moreover, there are white Plaintiffs whom, of all things are claiming racial discrimination from all Defendants and especially chief James Davis. One Plaintiff was wanting to use his time served/comp time as part of his retirement. However, chief James Davis denied the same, but chief James Davis allowed his ex-chief Tina Wallace to use her time. (Plaintiffs assert that Tina Wallace, by all counts of the eye vision, is a black female, of whom may be necessary to this claim as a Defendant as well, thereby Plaintiffs reserve the right to include the same at filing of the lawsuit).

Also, there is a female Plaintiff whom was denied advancement of a position, of which the Defendants failed to advertise an opening and instead of following the governmental policies of posting positions, chief James Davis called an employee whom was out sick and offered her the job that this female Plaintiffs was more than qualified to fill. Plaintiff contend that even the Mayor, Cheowke Antar Lumumba met with this female, asked her why she was leaving, and her response was "Mr. Mayor, you know that chief James Davis is a problem for that Police Department, so you know no-one can work under that pressure and stress nor should they be required to." This Plaintiff contend that she was forced to quit and go to work somewhere else but should have been relieved of the unwarranted hostile work environment by the mayor at that very hour, but the mayor

again chose to stick his head in the sand and ignore the problems with the City of Jackson Police Department.

Whistle Blower Act is violated by all Defendants because all Plaintiffs have filed written grievances and verbal communication to all Defendants.

In fact, Mayor Cheowke Antar Lumumba met in private with all these Plaintiffs, in a group session, on more than one occasion concerning issues that Plaintiffs had with the then Deputy Chief Tina Wallace, and Derrick Hearn, and chief James Davis. At one of the meeting, mayor Lumumba covenanted with Plaintiffs that he would personally see to it that things were changed. However, he breached that agreement. Instead, Plaintiffs contend that it appears that at the onset of a news report of a shooting, homicide, or other alerting news, it is then that mayor Lumumba immediately hold a news conference to reveal information regarding the same which in most cases, Plaintiff contend is not how the report was made.

Even more egregious is the fact that there are only [3] Detectives in Burglary, [3] Auto Theft, [Cease Fire [2], dealing with firearms, and Juvenile [3] and mobile crime lab is down to [2] detective, accident reconstruction [1], currently there are no Finger prints within the Jackson Police Department since last year. Identification only works from 8-4 p.m. there is not any person to provide MUG SHOTS, to prevent the citizens of Jackson from being harmed by the same culprit, so that culprit likely will be released until they are picked up out of a photo line up. Plaintiffs contend that there again, citizens lives are in harms way and the officers as well.

Plaintiffs further contend that upon information and belief, the State of Mississippi each year appropriates funds to pay for police protection to fair going during the Mississippi State Fair, and Plaintiffs believe that such funds are in the tune of \$50,000 plus dollars. However, Plaintiffs contend that the City of Jackson, Mayor Lumumba and other defendants gather a scheme to cause Plaintiff to work the Mississippi State Fair during their regular working hours and to this date, several Plaintiffs have not been paid monies that were allocated for the payment to these Plaintiffs. Plaintiff contend that there will be documentation provided in this lawsuit as well as requested audited information that should illuminate the mis-use of public funds by these Defendants.

Moreover, Plaintiffs' contend that Jackson Police Department, of which some of these Plaintiffs work, Precinct [3], is officer (mann-ed) by only 3 officers on duty at any given time. Plaintiffs' contend that not only is the officer life in danger, but the very person dialing 911 whom is expecting help is in danger. Additionally, there is a shortage of marked cars, detectives are required to police areas of the City of Jackson without any signal to the public that he is a police officer. In fact, on most detective cars the window tint is so dark until a citizen cannot see in. Plaintiffs' avers that these Defendants in forcing Plaintiffs' to work in such an environment places their lives in danger, so much so when a citizens of Jackson dials 911, pursuant to James Davis instructions Plaintiffs might have to assist another present just to answer the call.

Plaintiffs' acknowledge that this list is not inclusive but does provide Defendants the opportunity to create their defense in representing the soon to be lawsuit. Plaintiffs'

contend that this suit will provide numerous documents, recordings, and witnesses that will acquiesce the claims made by Plaintiffs including present and past employees of the City of Jackson.

Plaintiffs' further contend that if any retaliation from these Defendants in any form, that Plaintiffs' reserve the right to amend this notice or to the very least include the same in their soon to be filed lawsuit against these Defendants.

As a result, of all Defendants wrongful conduct, each Plaintiff as befallen to health issues, mental health issues, family consortium, loss of being, loss of wages, breach of fiduciary duties to Plaintiffs, as well as all other damages deemed proper by the jurisdictional court of whom the lawsuit will name,

Sincerely,

and may God Bless these Plaintiffs and the City of Jackson.


Abby Robinson, Esquire.

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/s/Abby Robinson esq/



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Abby Robinson, ESQ.

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Email: arobinsonlawfirm@yahoo.com

Email:

DATE: JULY 14, 2020

TO: CITY OF JACKSON

RE: CLAIM

TRANSMITTAL LETTER

Please find [1] envelope

Sincerely,

Abby Robinson esq.

RECEIVED BY:

DATE:

Latonya Ingram
7/14/2020

DEPARTMENT OF
MUNICIPAL CLERK
2020 JUL 14 PM 3:59